

United States District Court for the Middle District of Pennsylvania

Charles Talbert

No. 21-1231

FILED
SCRANTON

vs.

Honorable Judge Mannion

SEP 15 2021

John Wetzel, et al.

Plaintiff's Motion To Amend

PER


DEPUTY CLERK

Plaintiff, Charles Talbert, moves this Honorable Court for permission to amend his complaint for the following reasons:

1. To add Defendants: Department of Corrections, Lt. Hutchinson, Lt. Franklin, Sgt. Bilesta, Sgt. Everett, Of. Garcia, Of. Jones, Of. Silva, Of. Zagata, Of. Sims, Of. Donahue, Of. Shook, and Geisinger. The facts of the original complaint are basically the same, yet, other conditions of confinement were not mentioned due to lack of names.
2. To correct Defendant Adam Glushakows place of employment. He does not work at SCI Camp Hill. He works at SCI Phoenix.
3. To add the DOC as an "entity" in respect to Plaintiff's Title II of the Americans with Disabilities Act claims.

The Amendment is also to provide better detail on claims as in dates, etc, and to avoid amendment later on foreseeable motion to dismiss arguments. Attached hereto is the proposed amended complaint.

Respectfully submitted,


Charles Talbert

Charles Talbert

No. QAH727

SCI. Camp Hill

PO Box 8837

2500 Lisburn Road

Camp Hill, PA. 17001

September 10, 2021

U.S. Clerk of Court

U.S. Courthouse

Middle District

235 N. Washington Ave.

Scranton, PA. 18501

Re: Talbert v. Wetzel, et al, No. 21-cv-1231

Amended Complaint

Dear Clerk of Court:


Enclosed herein, please find a true copy of my:

1. Motion To Amend

2. Amended Complaint w Supplemental Summons

Please note my new address above herein. Thanks!

Yours Truly,


Charles Talbert

United States District Court for the Middle District of Pennsylvania

Charles Talbert
Department of Corrections; John Wetzel;

Christopher Oppman; Tabb Bickell; Tammy

Ferguson; Keven Ransom; Jason Bohinski;

No. 21-1231

Michael Gayne; Lt. Hutchinson; Lt. Franklin;

Sgt. Bilesta; Sgt. Everett; Of. Garcia; Of. Jones;

Of. Silva; Of. Zagata; Of. Maciejczak; Of. Sims;

Of. Donahue; Of. Shook; Susan Kuzminski;

William Midlick; Giselle Malet; Lea Martin;

Wellpath; George Dominici; Scott Prince;

Centurion Medical; Erich Weinstein; Adam

Glushakow; Gina Harrison; Geisinger.

Summons

To Said Defendants:

1. Department of Corrections, 1920 Technology Pkwy, Mechanicsburg, PA. 17050.

2. Lt. Hutchinson, Lt. Franklin, Sgt. Bilesta, Sgt. Everett, Of. Garcia, Of. Jones, Of. Silva, Of. Zagata, Of. Sims, Of. Donahue, and Of. Shook, SCI Dallas 1000 Pollies Road, Dallas, PA. 18612.

3. Geisinger,

You have been sued in court. You have 20 days to respond to the attached amended complaint. If you fail to do so, a judgment may be entered against you for the relief sought. Submit your answers and defenses with the Court as well as with the Plaintiff who can be reached at: Charles Talbert, QA4727, SCI Camp Hill, PA. Box 8837, 2500 Lisbon Road, Camp Hill, PA. 17001.

Clerk of Court

Dated:

Charles Talbot
Q44727
Sci. Camp Hill
PO Box 8837
2500 Lisbon Rd.
Camp Hill, PA 17001

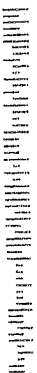
LEGAL

Office of the Clerk
U.S. District Court
Middle District of PA
U.S. Courthouse
235 N. Washington Ave.
Scranton, PA 18501-1148

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